

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN FULTON,)	
)	Case No. 20-cv-3118
<i>Plaintiff,</i>)	
)	Hon. Joan H. Lefkow
v.)	District Judge
)	
ROBERT BARTIK, <i>et al.</i>)	Hon. Maria Valdez
)	Magistrate Judge
<i>Defendants.</i>)	

ANTHONY MITCHELL,)	
)	Case No. 20-cv-3119
<i>Plaintiff,</i>)	
)	Hon. Joan H. Lefkow
v.)	District Judge
)	
ROBERT BARTIK, <i>et al.</i>)	Hon. Maria Valdez
)	Magistrate Judge
<i>Defendants.</i>)	

LOCAL RULE 54.3 JOINT STATEMENT
REGARDING SECTION 1988 FEES

Pursuant to section (e) of LR54.3, the parties submit the following Joint Statement with respect to the motion for fees and expenses filed by Loevy & Loevy, attorneys to Plaintiffs John Fulton and Anthony Mitchell:

1. Loevy & Loevy claims attorney's fees of \$4,421,180.50 and expenses of \$261,991.

Loevy & Loevy calculates this claim as follows:

Name	Role	Total Hours	Hourly Rate (USD)	Total Fees (USD)
Russell Ainsworth	Attorney	970.75	\$1,141.00	\$1,107,625.75
Bethan Gee	Paralegal	25.50	\$175.00	\$4,462.50
Isaac Green	Attorney	311.50	\$581.00	\$180,981.50
Sam Heppell	Attorney	297.00	\$777.00	\$230,769.00

Fatima Ladha	Attorney	346.75	\$473.00	\$164,012.75
Lauren Lebata	Paralegal	33.00	\$175.00	\$5,775.00
Jon Loevy	Attorney	778.00	\$1,500.00	\$1,167,000.00
Andrea Lyon	Attorney	292.00	\$1,141.00	\$333,172.00
Alyssa Martinez	Attorney	184.25	\$473.00	\$87,150.25
Alyssa Nekritz	Paralegal	275.50	\$175.00	\$48,212.50
Julia Rickert	Attorney	1106.00	\$948.00	\$1,048,488.00
Brynn Schaal	Paralegal	235.75	\$175.00	\$41,256.25
Olivia Toppel	Paralegal	13.00	\$175.00	\$2,275.00
			TOTAL FEES	\$4,421,180.50

2. The position of City of Chicago is that fees should be awarded in the range of \$851,375.00 to \$1,792,400.00 on the following basis:

Name	Requested rate	Adjusted Rate	Requested Hours	Adjusted Hours	Total Adjusted Fees With Hours and Rates Objections	Total Adjusted Fees With Rate Objections Only
Russell Ainsworth	\$1,141.00	\$500	970.75	487.05	\$243,525.00	\$485,375.00
Bethan Gee	\$175.00	\$100	25.50	10	\$1,000.00	\$2,550.00
Isaac Green	\$581.00	\$200	311.50	229	\$45,800.00	\$62,300.00
Sam Heppell	\$777.00	\$250	297.00	78.5	\$19,625.00	\$74,250.00
Fatima Ladha	\$473.00	\$200	346.75	180.5	\$36,100.00	\$69,350.00
Lauren Lebata	\$175.00	\$100	33.00	15.25	\$1,525.00	\$3,300.00
Jon Loevy	\$1,500.00	\$750	778.00	294	\$220,500.00	\$583,500.00
Andrea Lyon	\$1,141.00	\$500	292.00	171.5	\$85,750.00	\$146,000.00
Alyssa Martinez	\$473.00	\$200	184.25	20	\$4,000.00	\$36,850.00
Alyssa Nekritz	\$175.00	\$100	275.50	199	\$19,900.00	\$27,550.00
Julia Rickert	\$948.00	\$250	1106.00	690.5	\$172,625.00	\$276,500.00
Brynn Schaal	\$175.00	\$100	235.75	10.25	\$1,025.00	\$23,575.00
Olivia Toppel	\$175.00	\$100	13.00	0	\$0.00	\$1,300.00
				TOTAL FEES	\$851,375.00	\$1,792,400.00

3. Respondent's position is that any request by Movants for costs is untimely under LR 54.1, and therefore the Court should award \$0.00 of related nontaxable expenses.
4. The specific disputes remaining between the parties are the following:
 - a. The appropriate hourly rates for each Loevy & Loevy attorney;
 - b. Whether certain hours claimed by each Loevy & Loevy attorney should be compensated;
 - c. Whether Loevy & Loevy are entitled to costs under LR 54.1.
5. The underlying judgment in the case will be appealed and therefore there are remaining disputes in the litigation, in addition to the appropriate fee award. Defendants contend no fees are appropriate until those issues are resolved and Plaintiffs are deemed a prevailing party. Plaintiffs' position is that they are already prevailing

Respectfully submitted,

For Plaintiff:

/s/Jon Loevy

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